

My name is Merlyn Wade.

I operate a licensed limousine carrier company providing service to residents of Washtenaw, Lenawee, Livingston, Ingham, and Wayne County. I am a member of the Great Lakes Limousine Association.

I am in support of bills 184, and 188. I am opposed to any bills that are intended to give special treatment to the ride networking companies, such as Uber and Lyft. Any special status or bill that would give benefit to only Uber, Lyft, as well as other "ride sharing" companies will create chaos in the transportation industry, expose the general public to a safety risk and will NOT create meaningful employment positions. It is my belief that this would be to the contrary in fact.

The drivers for ride networking companies in Michigan are NOT employees and are merely **independent contractors** who are NOT closely monitored by the national ride networking companies. These national ride networking companies are not based in Michigan. The Michigan Limousine Transportation Act is a safeguard that protects the general public, regulates the safety of limousine vehicles and requires a minimum level of insurance for limousines.

Just because smart phones are convenient tools to order service, DOES NOT mean that we should eliminate safety regulations in favor of technology.

Eliminating licensing of the limousine industry by the State of Michigan because a person can order a limousine ride by a cell phone is comparable to saying that we should eliminate the licensing pharmacies and pharmacists because we can order prescription drugs by cell phone.

The pending grouping of bills will protect the customers of these unlicensed drivers that have been illegally operating in the State of Michigan since being issued a cease and desist order by MDOT in December, 2013. These bills will protect the public at large by :

- (a) ensuring liability for workers compensation injuries suffered by drivers who get injured carrying heavy luggage or in traffic accidents,
- (b) lessen exposure of the public to potential crimes
- (c) ensuring reliable enforcement of vehicle standards state wide, and
- (d) ensuring reliability regarding insurance coverage in case of injury.

The people of Michigan look to their state government, specifically the Michigan Department of Transportation, to monitor the limousine operators by establishing licensing standards. The people also expect that licensed limousines

are safe so that (a) their high school students will be able to enjoy the prom, (b) people getting married will have a safe and joyful wedding ceremony, (c) business people will have reliable transportation for important meetings and (d) people can ride without the fear that they may be sexually assaulted.

Our current limousine licensing system involves **local limousine carriers** who work with their insurance carriers to pick safe drivers and put safe equipment on the roadways.

The national ride sharing companies will fail in trying to convince Michigan citizens that they will closely monitor drivers and closely monitor the condition of the mechanical status for the limousine vehicles.

As you may be aware, limousine operators are licensed by the State of Michigan Department of Transportation and a limousine vehicle is authorized by the state to operate anywhere in the state. During a contracted ride, a vehicle could possibly go through 15 different jurisdictions going from place of origin to place of destination.

Limousines do not need local regulation by cities, townships and villages, to fact that limousines travel through many local government units during a contracted ride. During 2011, SB 561 (which the limousine operators enthusiastically supported) passed the Senate but did not get out of the Transportation Committee in the House. That bill would have stopped local units of government from regulating and licensing limousine operators and/or limo drivers. The concept is as follows: We all have a state-wide driver license. Should each city government or local unit of government be able to force a driver to have an additional driver license for that local unit of government? The cities just want money and could care less about the destruction of jobs due to expensive regulation of business. The State of Michigan Department of Transportation has a limousine enforcement office that can easily work in conjunction with the Michigan State Police to enforce the Michigan Transportation Act.

Also, understand that cab companies are NOT licensed by the State of Michigan Department of Transportation and get all of their authority from the local unit of government where they operate. Cabs are local carriers within the city that authorizes the taxi cab operator. Limousines are intended to go for long rides, and operate traveling throughout multiple municipalities. Placing the "TNC's" under the jurisdiction of the Limousine Transportation Act would insure the public at

large is protected in an efficient manner that would be the least invasive as possible when it comes to operating a small business in the State of Michigan. There are cab companies in certain cities that want to harm the limousines and eliminate competition by working with the cities to attempt to regulate limousines. This would create a logistical nightmare and make it almost impossible to operate in my personal opinion. The market that we compete and operate in within this great state tends to be rural and spread out in many cases in my humble experience. Imagine trying to comply with different rules, regulations, licensing requirements, as well as rates for every municipality in 5 counties. It would put many small companies out of business in my opinion.

The pending grouping of bills would protect the public at large as well as small business, the general public, and be a great for benefit for homegrown Michigan jobs and small business owners such as myself. While preventing a mass exodus of Michigan made profits that benefit out-of-state companies and helping our Michigan economy to continue to grow as well as gain and maintain the strength and longevity that we so desperately need here in the State of Michigan.

I ask that you support bills 184, and or 188 as well as the Michigan Limousine Transportation Act. I also ask you avoid giving special treatment for the ride networking companies. Giving ride sharing companies special treatment would

create something comparable to the "Wild West." Ask your local police force commanders in your local House districts about the many problems that already exist with inadequate ride network drivers. We look to our government leaders, such as yourself, to prevent a "Wild West" situation.

Councilmember Sabra Briere (D-Ward 1) Ann Arbor is quoted in a article in the Michigan Daily, in regards to regulating uber lyft and other ride sharing companies saying that " Part of the reason we struggled with this is because the only model we have is an old model that doesn't respond to modern technology,"

In response to this I disagree, I and other owners of transportation companies in this city do have the technology available and have had said Tech available to us for quite a while now. (Myself for approx. 2 years) The app name is ReadyRide. So for people to say we are behind the times is completely inaccurate because that is simply not the case and a uneducated statement to say the least.

Briere said Rather,(paraphrasing here)-----> existing rules and regulations treated rideshare services as if they were taxi services, instead of a separate entity. "Trying to make (Uber) operate like a taxi would destroy it," Briere said.

My response to this is as follows: Allowing ride sharing companies to operate as they do is destroying the existing transportation industry, And that's OK? Ride sharing companies operate in a criminal manner and have done so in the state of Michigan for the last year. They don't need special rules. They need to follow the same rules every other law abiding business in the state follows and not pay off lobbyists and legislatures to reinvent the law to monopolize the transportation business. Everything they need to operate is already in place in the state limousine transportation act.

In December 2013 - the state of Michigan issued a Cease and Desist by way of MDOT regarding dispatching to non-State Limousine licensed class b limos. Uber continued to advertise and do business with non-licensed independent contractors using personal vehicles with personal insurance and non-Commercial License Plates. And continue to do so to this day This is in Violation of the Limousine Act 271 and the State Vehicle Code requiring Vehicles for Hire to have a "Regular" Commercial License Plate and Drivers to have a Chauffeurs license

Many ride sharing companies in Michigan and many others are operating a criminal enterprise. Intentionally using illegal vehicles, and illegal operators for profit in violation of the Cease and Desist as well as the State Law.

Ann Arbor even sent a cease and desist letter to Uber and Lyft yet they continued to operate with blatant disregard for the law. Full steam ahead no stopping in sight. So do we reward the people operating in a clearly criminal manner? I would hope not.

If ride sharing companies wish to operate that is fine but they need to abide by all of the same rules the honest people have been following the entire time.

It's only a true free market if everyone has to follow the same rules.

It's only fair if everyone has to follow the same rules.

Let me say it again, Ride sharing companies are welcome to compete. They just need to follow the same rules everyone else does.

They say they are a software or tech company but they operate just like a car/taxi/limo company. They organize drivers to operate illegally telling them it's ok to operate without following the rules under the guise of saying they are disruptive tech when it's not.

They promote it like it's a new cool fad.

They practice predatory pricing at pre-1994 levels to run the competition out of business. Which they are able to do because they don't follow the rules in place for the chosen industry they have entered.

They Practice smoke and mirrors politics saying they are a TNC or software company when in fact they are operating a commercial transportation for hire business i.e. Taxi/Limo company.

Uber takes the payment from the customer for transportation from said point A to said point B not the driver. And Uber pays the driver not the customer. Hence Uber is in form providing said customer transportation by providing car and driver with said phone app and accepting payments for said service.

They are a Car/Taxi/Limo company no matter how they attempt to portray themselves. And the drivers are given payment by Uber and a 1099 at the end of the year for it. This means the drivers are operating as independent contractors and technically using their own equipment need to insure and license as well.

In closing all that I am asking for is fairness. If ridesharing companies don't have to follow the rules then I have to ask myself.....why should I?

There's so much more to this but hopefully this paints a better picture of whats going on here for those who are reading

THANK FOR LISTENING.

Merlyn Curtis Wade Jr

Ann Arbor Airport Shuttle Service LLC

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A handwritten signature in black ink, appearing to read 'Merlyn Wade', with a horizontal line underneath.